

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS**

THE MEDICINES COMPANY,

Plaintiff,

v.

MYLAN INC.,  
MYLAN PHARMACEUTICALS INC., and  
BIONICHE PHARMA USA, LLC,

Defendants.

No. 1:11-CV-01285

Hon. Amy J. St. Eve

Hon. Susan E. Cox, Magistrate Judge

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**DECLARATION OF AUTUMN N. NERO ACCOMPANYING  
MYLAN'S MOTION FOR BILL OF COSTS**

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I, Autumn N. Nero, declare as follows:

I am at partner at the law firm of Perkins Coie LLP, 1 East Main Street, Madison, Wisconsin 53703, which represents Defendants Mylan Inc., Mylan Pharmaceuticals Inc., and Bioniche Pharma USA, LLC (collectively, “Mylan”) in the above-captioned matter. I make this declaration based on my personal knowledge and in connection with Mylan’s Motion for Bill of Costs.

1. Attached as Exhibit 1 is a true and accurate copy of Mylan’s Form AO 133 Bill of Costs.

2. Attached as Exhibit 2 is a true and accurate copy of Mylan’s invoices and records for having served subpoenas in this case and a PayPal receipt for filing Mylan’s Notice of Appeal. A summary table of actual and taxable costs, “§ 1920(1) Costs for the Clerk and Marshal,” is included on page 1.

3. Attached as Exhibit 3 is a true and accurate copy of Mylan’s court reporter invoices for depositions and video-recording in the case. A summary table of actual and taxable costs, “§ 1920(2) Deposition Transcript and Video-Recording Costs,” is included on pages 1–2.

4. Attached as Exhibit 4 is a true and accurate copy of Mylan’s trial transcript invoices. A summary table of actual and taxable costs, “§ 1920(2) Trial Transcript Costs,” is included on page 1.

5. Attached as Exhibit 5 is a true and accurate copy of Mylan’s witnesses’ invoices and receipts for travel, lodging, and subsistence costs. A summary table of actual and taxable costs, titled “§ 1920(3) Witness Attendance Fees, Travel, Lodging, and Subsistence Costs,” is included on page 1.

6. Attached as Exhibit 6 is a true and accurate copy of Mylan's experts' invoices reflecting time spent preparing for, attending, and reviewing their depositions. A summary table of actual and taxable costs, titled "§ 1920(3) Expert Deposition Fees," is included on page 1.

7. Attached as Exhibit 7 is a true and accurate copy of invoices for the certified copies of U.S. Patent Applications 12/180,553 and 12/180,551 and related costs.

8. Attached as Exhibit 8 is a true and accurate copy of a list of pleadings filed by Mylan, including the number of pages, in-house copying cost per page, and total requested copying cost.

9. Attached as Exhibit 9 is a true and accurate copy of invoices from Mylan's third-party vendor, RICOH, relating to copies and binders made for trial. A summary table of Exhibit 7, 8, and 9 costs, titled "§ 1920(4) 'Copying' Costs," is included on pages 1–2.

10. Attached as Exhibit 10 is a true and accurate copy of Mylan's invoices from third-party electronic discovery vendors Barrister Digital Solutions, L.L.C. and Epiq eDiscovery Solutions, Inc. A summary table of taxable costs, titled "§ 1920(4) Fees for Copying – Electronic Discovery" is included on page 1. Exhibit 10 is filed under seal; a redacted copy is filed herewith.

11. Attached as Exhibit 11 is a true and accurate copy of excerpts from Mylan's (Perkins Coie's) in-house electronic discovery as it relates to taxable "copying" costs. This excerpt of taxable costs was compiled under my supervision from internal e-discovery records reflecting a total of \$130,451.02 in Perkins Coie in-house e-discovery costs (for electronic discovery employees; excluding attorney- and paralegal-billed time) for this case between the dates of September 9, 2011, and October 19, 2012. Exhibit 11 is filed under seal; a redacted copy is filed herewith.

12. Attached as Exhibit 12 is a true and accurate copy of trial exemplification invoices from third-party vendors Demonstratives and BlueBear Solutions, Inc. A summary table of actual and taxable costs, titled “§ 1920(4) Exemplification Costs,” is included on page 1. Exhibit 12 is filed under seal; a redacted copy is filed herewith.

13. Attached as Exhibit 13 is a true and accurate copy of the April 25, 2014 letter from Emily Greb to Jason Kanter.

14. Attached as Exhibit 14 is a true and accurate copy of the May 1, 2014 email from Jason Kanter to Emily Greb.

15. Attached as Exhibit 15 is a true and accurate copy of the GSA per diem rates for Chicago in FY2014, available at <http://www.gsa.gov/portal/category/100120>.

16. Attached as Exhibit 16 is a true and accurate copy of the GSA per diem rates for Manhattan, New York City in FY2013, available at <http://www.gsa.gov/portal/category/100120>.

17. Attached as Exhibit 17 is a true and accurate copy of the CVs of Mylan experts David E. Auslander, Ph.D.; Ivan T. Hoffman, C.P.A., C.F.F., C.L.P.; Nancy J. Link, Ph.D.; and Ian W. McKeague.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 27, 2017

/s/ Autumn N. Nero  
Autumn N. Nero, Esq.

**CERTIFICATE OF SERVICE**

I, James B. Coughlan, hereby certify that on July 27, 2017, I electronically filed the foregoing **DECLARATION OF AUTUMN N. NERO ACCOMPANYING MYLAN'S MOTION FOR BILL OF COSTS** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record. A copy of the exhibits filed under seal will also be served on all counsel of record by email.

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/s/ James B. Coughlan